

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 04-10246-PBS
)
BRIAN TODD)

ASSENTED-TO MOTION TO RESCHEDULE FINAL REVOCATION HEARING

Defendant, Brian Todd, hereby requests the Court continue his Final Revocation Hearing scheduled for July 7, 2008 to a date convenient to the Court during the week of July 28, 2008. The defendant requests this continuance in order to conduct additional investigation into the circumstances surrounding the alleged violations, and to pursue ongoing discussion with the Probation Department and government regarding an agreed-upon recommendation as to the disposition of the case.

Assistant U.S. Attorney Donald Cabell and U.S. Probation Officer John Marshall have been informed of this request and they do not object to rescheduling this hearing.

BRIAN TODD
By his attorney,

/s/Ian Gold
Ian Gold
B.B.O. # 665948
Federal Defender Office
408 Atlantic Avenue, 3rd Floor
Boston, MA 02110
Tel: 617-223-8061

July 2, 2008

CERTIFICATE OF SERVICE

I, Ian Gold, do hereby certify that this motion has been filed electronically and that it will be served electronically on registered ECF participants as identified on the Notice of Electronic Filing (NEF) on July 2, 2008.

/s/ Ian Gold